

APPLICANT(S): WALD, Ofer
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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicant asserts that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims **1-36** are pending.

Claims **1- 36** have been rejected.

Claims **1-28** and **30-35** have been amended in this submission. No new matter was added. For example, the amendments of claims **1, 11, 22, 23** and **30** find support in paragraphs [[0055], [0082], and [0037]].

35 U.S.C. § 102

In the Office action, the Examiner rejected claims **1-36** under 35 U.S.C. § 102 as being anticipated by Bijwaard (US Patent Application Publication No. –2002/0062372). Applicant respectfully traverses the rejection of claims **1-36** under the Hong -reference.

The Hong reference discloses a method for building a high performance server farm with tagging and pipelining, using Squid Web Proxy Cache.

The Hong reference applies to one interconnected cluster with redundant servers.

The Hong reference suggests usage of Squid Web Proxy Cache. The Squid Web Proxy Cache provides web proxy and reverses web proxy services within a cluster. The Squid Web Proxy Cache enables usage of the cluster as a file source. The Squid Web Proxy Cache does not teach or suggest usage of predetermined devices that do not belong to the cluster of servers.

In paragraph [0083] Hong tries to cure the deficiencies of the Squid Web Proxy Cache by suggesting interconnected network of mutually-dependant clusters with known geo_location where different clusters are responsible for different levels of hot files. Hong does not teach or suggest a system where the clusters do not belong to ISP. Furthermore Hong does not teach or suggest usage of predetermined devices that are not clusters of servers and do not belong to the cluster of servers.

Furthermore, the Hong reference does not teach or suggest distributing peer to peer files between the various members of the cluster; and providing peer to peer files previously stored in a member of the cluster from outside the cluster of servers if the member of the cluster fails.

For a reference to anticipate a claim, the reference must teach all elements of the claim. Therefore, the Hong reference cannot anticipate claims **1, 11, 22, 23** and **30**, as amended.

Accordingly, Applicant respectfully asserts that amended independent claims **1, 11, 22, 23** and **30** are allowable. Claims **2-10, 12-21, 24-29** and **31-36** depend from claims **1, 11, 23** and **30** and therefore include all the limitations of those claims. Therefore, Applicant respectfully asserts that claims **2-10, 12-21, 24-29** and **31-36** are likewise allowable. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections to amended independent claims **1, 11, 22, 23** and **30** and to claims **2-10, 12-21, 24-29** and **31-36** dependent thereon.

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In view of the foregoing amendments and remarks, Applicant asserts that the pending claims are allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Respectfully submitted,

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